

**UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

LEK SECURITIES
CORPORATION, et al.,

Defendants.

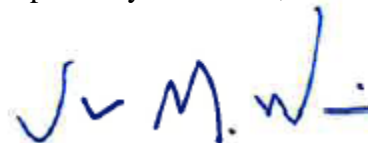
Case No. 17-CV-1789 (DLC)

**DEFENDANTS PUSTELNIK, FAYYER AND AVALON'S MEMORANDUM OF LAW
IN SUPPORT OF MOTION FOR JURY TRIAL ON AMOUNT OF DISGORGEMENT**

PLEASE TAKE NOTICE that Defendants Sergey Pustelnik, Nathan Fayyer, and Avalon FA Ltd.'s ("Defendants") respectfully submit this Memorandum of Law in Support of their Motion for a jury trial with respect to the amount of disgorgement if the SEC establishes liability. Defendants will move this Court before the Honorable Denise L. Cote at the U.S. Courthouse located at 500 Pearl Street, NY, NY, at a date to be determined by the Court, for an Order granting Defendants' Motion and awarding them a jury trial on the amount of disgorgement if the SEC is able to prove liability, and for such other relief as this Court may deem just and proper.

Dated: October 15, 2019

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "J. M. Wines", is written over a horizontal line.

James M Wines

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